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few days later from blood poisoning, which the physician testified was caused by pollution, either from the fishbone or insured's finger in removing it. The insurance certificate was conditioned on death being the result "of external, violent, and accidental means." It was claimed that, as the injury was altogether internal, no recovery could be had; but the court drew a distinction between an injury and the means of injury, and awarded a decree requiring the defendant association to levy an assessment on its members and pay the proceeds of insured's certificate. The court said that it would be presumed that, owing to the instincts of self-preservation, the bone had not been swallowed voluntarily, and that, even if taken carelessly, the fact of injury of this character from taking indigestible matter into the alimentary canal was so out of the ordinary as to constitute an accident; and that, while death was caused by blood poisoning, the poisoning itself would not have occurred had it not been for the accident.

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**Marriage of Alien Woman to Citizen.**—Some interesting questions arise in the cases of *United States ex rel. Nicola v. Williams* and *United States ex rel. Gendering v. Same*, decided by the United States District Court for the Southern District of New York, and reported in 173 Federal Reporter, 626. In the first case, relator, a subject of Turkey, was married to a citizen of the United States, who brought her to this country, where she was stopped by the immigration authorities on the ground that she was suffering from a disease which would exclude her if an alien. The court held that immediately upon her marriage she became a citizen of the United States because of the citizenship of her husband, and could not therefore be excluded, notwithstanding she had never resided in this country. In the second case, the relator came to this country from Holland and married an alien Dutchman in New York. She afterward left her husband, and went back to Holland with a paramour. While residing in that country her husband became a naturalized citizen here. The court held that her citizenship followed that of her husband, notwithstanding her infidelity, and that she was entitled to re-enter this country.

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**Competency of Roman Catholic Jurors in Action against Bishop.**—Because a Roman Catholic bishop was a party to an action, the lower court excluded from the jury all persons of Roman Catholic faith, without reference to their residence, or to any close affiliation with the local church, on the ground that they have a pecuniary interest in the suit analogous to that which taxpayers have in a suit against the city or town in which they reside. The Supreme Judicial Court of Massachusetts in *Searle v. Roman Catholic Bishop of Springfield*, 89 Northeastern Reporter, 809, holds that it cannot be